



COMMONWEALTH of VIRGINIA

OFFICE OF CHILDREN'S SERVICES

Administering the Children's Services Act

September 20, 2016

SCOTT REINER, M.S.
Executive Director

Lisa Linthicum, CPMT Chair
Department of Social Services
P.O. Box 860
Rustburg, VA 24588

RE: Campbell County CSA Program Self-Assessment Validation, File No. 20-2015

Dear Ms. Linthicum,

In accordance with the Office of Children's Services (OCS) Audit Plan for Fiscal Years 2013-2015, the Campbell County Community Policy and Management Team (CPMT) has completed and submitted the results of the self-assessment audit of your local Children's Service Act (CSA) Program by the established due date of December 31, 2015. An on-site visit was scheduled and conducted by OCS Program Auditors on May 2, 2016 to perform the independent validation phase of the process.

Based on the review and examination of the self-assessment workbook and supporting documentation provided by the Campbell County CSA program, our independent validation:

Concur Partially Concur Does Not Concur

with the conclusion reported by the Campbell County CPMT that no significant observations of non-compliance or internal control weaknesses were found in the design or operation of the processes or services conducted on behalf of the Campbell County CSA program. The explanation for our assessment results are as follows:

Campbell County Community Policy and Management Team concluded that only non-significant compliance and/or internal control weakness observations noted. However, validation procedures of the locally prepared CSA Self-Assessment Workbook identified major deficiencies¹ indicating non-compliance in the local CSA program. Non-compliance with the statutory requirements of CSA is considered significant because the local program is not operating fully in accordance with the laws of the Commonwealth. An adequate system of internal controls is contingent upon consistent and proper application of established policies and procedures affecting CSA funded activities as well as monitoring oversight by the governing authorities to ensure that the program is operating accordingly.

¹ Major deficiency is defined as an internal control deficiency or combination of deficiencies that severely reduces the likelihood that the entity can achieve its' objectives." Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal Control Integrated Framework, May 2013.

Such breakdowns in an organization's internal control structure are considered significant. Specifics pertaining to the Campbell County CSA Program are detailed below.

SIGNIFICANT NON-COMPLIANCE AND INTERNAL CONTROL WEAKNESSES
OBSERVATION 1
<p>Expenditure reimbursements were requested and processed for payment of services where the requirements for compliance with State CSA policies and procedures were not met. Eligibility for funding for services through the state pool of funds, per Code of Virginia § 2.2 5212 requires use of a uniform assessment instrument and process and by policies of the Community Policy and Management Team (CPMT) to have access to these funds.</p> <p>The Child and Adolescent Needs and Strengths (CANS) Assessment is the mandatory uniform assessment instrument approved by the State Executive Council (SEC). In one case examined the CANS had not been completed prior to February 5, 2014 though services were initiated and funded prior to that date. An annual comprehensive CANS was not completed a year later, thus there was not a valid CANS between February 4, 2015 and February 2016. Per CSA Policy, a CANS assessment is required initially and at least annually. The associated questioned cost equaled \$20,256.47 (state share).</p>
<p>CRITERIA COV § 2.2-5212; CSA Policy Manual Sections 3.6 Mandatory Uniform Assessment Instrument (Adopted December 18, 2007, Updated May 12, 2008); 4.6 Denial of Funds (Adopted June 23, 2011) CANS Frequency of Administration updated 2013</p>
OBSERVATION 2
<p>Internal controls established by CSA statutes were not effectively implemented by the CPMT in order to safeguard against conflicts of interest pertaining to the referral of services and approval of access to CSA pool funds by eligible youth and their families. Non-public members serving on the Family Assessment and Planning Team (FAPT) did not complete the Statement of Economic Interest (SOEI) form as required by statute. Based on the increased possibility that required parties may not have appropriately disclosed personal interests the effectiveness of the controls to ensure accountability and appropriate use of CSA pool funds could be significantly reduced.</p>
<p>CRITERIA: COV Sections: § 2.2-3100; § 2.2-3101; § 2.2-3115; § 2.2-3117; § 2.2-5205; § 2.2-5206 § 2.2-5207; DOA Agency Risk Management and Internal Control Standards, Control Activities</p>
RECOMMENDATIONS
<ul style="list-style-type: none"> • The CPMT should ensure that all requirements for compliance with State CSA policies and procedures are met prior to accessing CSA pool funds. • The CPMT and FAPT should ensure CANS assessments (initial, re-assessment and discharge in accordance with Campbell County Utilization Review Policy) should be completed in CANVaS and maintained in the client record. • The CPMT should submit a quality improvement plan, for review by the OCS Finance Office, to address whether the funds will be restored. Upon review and recommendations presented by OCS Finance staff, the CPMT will be notified of the final determination made by the Executive Director of whether the identified actions are acceptable or any additional actions that may be required. • The CPMT should ensure that the SOEI form is completed immediately for all non-public participating members serving on the FAPT.

CLIENT COMMENT:

Please see the attachment for client comments.

The Office of Children's Services respectfully requests that you submit a quality improvement plan to address the observations outlined in this report no later than 30 days from receipt of this report. In addition, we ask that you notify this office as quality improvement tasks identified are completed. OCS will conduct a follow up validation to ensure the quality improvements have been implemented as reported.

We would like to thank the Campbell County Community Policy and Management Team and related CSA staff for their contributions in completing the CSA Self-Assessment Workbook. We also would like to acknowledge the excellent assistance and cooperation that was provided by Brittany McGeoch, CSA Coordinator and Summer Tetterton, Director of Campbell County Youth, Adult and Community Services during our on-site visit. Their efforts enabled the audit staff to quickly resolve any questions/concerns that we observed during the validation process. Please feel free to contact us should you have any questions.

Sincerely,


Annette E. Larkin
Program Auditor

cc: Scott Reiner, Executive Director
Frank J. Rogers, Campbell County Administrator
Brittany McGeoch, CSA Coordinator
Stephanie Bacote, OCS Program Audit Manager
SEC Finance and Audit Committee

Campbell County

Virginia

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September 7, 2016

Annette E. Larkin
Program Auditor
Office of Children's Services
1604 Santa Rosa Road, Suite 137
Richmond, VA 23229

Dear Ms. Larkin:

Thank you for sharing the Campbell County Children's Services Act (CSA) Program Self-Assessment Validation Draft Report. Campbell County Community Policy and Management Team (CPMT) and CSA Office take great pride in all efforts made to ensure that needed and necessary services are provided to our locality's youth and families.

As you may remember, the CSA Office initiated contact with non-public participating members serving on the Family Assessment and Planning Team (FAPT) on the day of the validation visit to remediate Observation number 2 cited in the draft report. The *Statement of Economic Interest* forms have been received and procedures have been implemented to ensure ongoing compliance with this requirement.

In response to Observation number 1, the Campbell County CPMT acknowledges that interpretation of the policies has been improperly administered. We have taken active steps with the school division to remediate the concerns cited in the report. The first specific action step is a Memorandum of Understanding (MOU) that has been developed by the CPMT and School Division. This agreement will be presented at the CPMT monthly meeting scheduled for September 28, 2016, for adoption and signature.

In addition, the County's reorganization of the CPMT better aligns accountability for administration of services to children and families. Specifically, The Campbell County Schools has appointed the Director of Student Support Services as the representative on CPMT. The Schools have assigned a Student Support Specialist to serve on FAPT with the primary responsibility of ensuring completion of Child and Adolescent Needs and Strengths Assessment (CANS). The actions taken by the school division are indicative of the commitment to ensure cooperation with CPMT while making decisions under Individual with Disabilities Education Act (IDEA) involving private placements.

We trust that the above noted changes in operations for the Campbell County CPMT for remediation and changes to procedures by the school division are sufficient in addressing the concerns noted in the draft report received on August 25, 2016.

With kind regards, I am
Very Truly Yours,



Lisa C. Linthicum
Chairperson, CPMT